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✓ FILED
— ENTERED
— SERVED ON
COUNSEL/PARTIES OF RECORD

DEC 23 2015

CLERK US DISTRICT COURT
DISTRICT OF NEVADA

BY: _____ DEPUTY

16 UNITED STATES DISTRICT COURT
17 DISTRICT OF NEVADA

18 U.S. EQUAL EMPLOYMENT OPPORTUNITY
19 COMMISSION,

20 Plaintiff,

21 vs.

22 LIBERTY CHRYSLER, JEEP, DODGE LLC,
23 INTERNET AUTO RENT & SALES OF LAS
24 VEGAS INC., INTERNET AUTO RENT &
SALES INC.

25 Defendants.

Case No.: 3:15-cv-00232-HDM-VPC

STIPULATION TO EXTEND
SCHEDULED DEADLINES AND
[PROPOSED] ORDER

(Second Request)

26 Pursuant to Local Rule 26-4 and as referenced in the Parties' Joint Case Management Report
27 (ECF #66), Plaintiff U.S. EQUAL EMPLOYMENT OPPORTUNITY COMMISSION (hereinafter
28 "Plaintiff" or "EEOC") and Defendants LIBERTY CHRYSLER, JEEP, DODGE LLC, INTERNET

1 AUTO RENT & SALES OF LAS VEGAS INC., and INTERNET AUTO RENT & SALES INC.
2 (hereinafter collectively “Defendants”) respectfully request an extension of two deadlines: the
3 deadline for the disclosure of expert witnesses and deadline for the disclosure of rebuttal experts.
4 All other deadlines will remain the same.

5 (a) and (b) As discussed in detail in the Parties’ Stipulation to Extend Scheduled Deadlines
6 and [Proposed] Order (ECF #50), the Parties have been diligent in discovery in light of the Court’s
7 discovery schedule. Written discovery has been exchanged and multiple depositions have been
8 taken and scheduled.

9 (c) The discovery matter at issue pertains to the disclosure of expert witnesses and the
10 disclosure of rebuttal experts. Currently, the deadline for the disclosure of expert witnesses is
11 February 1, 2016, and the deadline for the disclosure of rebuttal experts is March 2, 2016. The
12 EEOC has secured an economic expert for this case, and Ms. Shara Rynearson’s testimony may be
13 dispositive to the expert’s analysis.

14 For reasons outside of the Parties’ control, the deadlines for the expert and rebuttal reports
15 may not be met. The Court approved the stipulated protective order on Ms. Rynearson’s medical
16 records on November 23, 2015 (ECF #60). Defendants issued their subpoenas duces tecum to Ms.
17 Rynearson’s medical providers in order to obtain medical records and information in early
18 December 2015. Defendants anticipate obtaining these records in late December 2015 and early
19 January 2016. Because Defendants would like Ms. Rynearson’s medical and employment records
20 prior to deposing her, they have vacated and rescheduled Ms. Rynearson’s deposition to the end of
21 January or the beginning of February 2016. Without Ms. Rynearson’s testimony, the EEOC’s expert
22 may not be able to complete his report by the current deadline of February 1, 2016.

23 (d) Proposed Schedule: To allow the parties sufficient time to complete discovery, the
24 Parties hereby stipulate and respectfully request that the Court continue two deadlines by thirty (30)
25 days:
26
27

28 **Disclosure of expert witnesses:** From February 1, 2016 to March 3, 2016

1 **Disclosure of rebuttal experts:** From March 2, 2016 to March 31, 2016¹
2

3 All other deadlines will remain the same:
4

5 Discovery cut-off: March 31, 2016
6 Dispositive motions deadline: May 2, 2016
7 Joint pretrial order deadline: May 31, 2016
8

9 **IT IS SO STIPULATED.**
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11 Dated: December 17, 2015

U. S. EQUAL EMPLOYMENT
OPPORTUNITY COMMISSION

16 Dated: December 17, 2015

LEWIS ROCA ROTHGERBER LLP

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CERTIFICATE OF SERVICE

I am, and was at the time the herein service took place, a citizen of the United States, over the age of eighteen (18) years and not a party to the above-entitled cause.

I am employed in the Legal Unit of the San Francisco District Office of the United States Equal Employment Opportunity Commission.

My business address is Equal Employment Opportunity Commission, San Francisco District Office, 450 Golden Gate Avenue, 5 West, P.O. Box 36025, San Francisco, CA 94102.

On the date that this declaration was executed, as shown below, I served the following document:

STIPULATION TO EXTEND DEADLINES AND [PROPOSED] ORDER

by email on the following person(s):

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I declare under penalty of perjury that the foregoing is true and correct. Executed on December 17, 2015, at San Francisco, CA.

//s// Sirithon Thanasombat

Sirithon Thanasombat